

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

KENNETH BOLLING,)
Plaintiff,)
)
)
)
v.) Civil Action No.: 2:19-cv-244-RAH
)
)
CITY OF MONTGOMERY,)
Defendant.)

DEFENDANT'S WITNESS LIST

COMES NOW the Defendant City of Montgomery, and submits the following names of potential witnesses to be called in the trial of the above styled matter:

EXPECT TO CALL:

1. Chief Miford Jordan
2. J.L. Petrey
3. Matthew Manning
4. Earnest Finley, III
5. Thomas Hawkins
6. Carrie Dunnivan
7. Ronald Sams
8. Bill Barousse
9. Kim Neese

10. Carmen Douglass

11. City of Montgomery Corporate Representative

- a. City Employee Handbook
- b. Personnel Rules
- c. Employee Benefits

MAY CALL:

12. Claire King

13. Brian Champlin

14. Jason Hunt

15. Ken Nixon, Court Administrator

16. Kenneth Bolling, Plaintiff

17. Martha Earnhardt

18. Betty Gates

19. Assistant Chief Stanley Cooper

20. Assistant Chief Ronnie Bozeman

21. Deputy Chief A.L. Wright

22. Lisa McKinnon

23. Ebony McKinnon

24. Keiona Bolling

25. All witnesses identified on Plaintiff's Witness List.

26. Any witnesses necessary for rebuttal.

27. Any witnesses necessary for impeachment.

28. Any witness necessary for authentication of evidence.

29. Any witnesses discovered hereafter.

30. The Defendant reserves the right to amend this witness list if necessary.

Dated this the 4th day of January, 2021.

/s/ Ashley N. Smith
ASHLEY N. SMITH (SMI312)
Attorney for Defendant
ASB-7096-A56S

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on the following counsel of record via the Court's CM/ECF filing system on January 4, 2021:

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/s/ Ashley N. Smith
ASHLEY N. SMITH